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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**YOUNG AMERICANS FOR LIBERTY AT  
MONTCLAIR STATE UNIVERSITY, and MENA  
BOTROS;**

Plaintiffs,

v.

The Trustees of Montclair State University—  
**ROSE L. CALI, MARY A. COMITO, VICE-CHAIR  
DR. FRANCIS M. C. CUSS, CHAIR GEORGE J.  
HILTZIK, LAWRENCE R. INSERRA, JR.,  
DOUGLAS L. KENNEDY, RALPH A. LAROSSA,  
JEAN MARC DE GRANDPRE, JOHN L.  
MCGOLDRICK, WILLIAM T. MULLEN,  
PRESTON D. PINKETT III, SECRETARY KENT  
SLUYTER, and STUDENT NIKITA WILLIAMS**—  
all individually and all in their official  
capacities as members of the Montclair State  
University Board of Trustees; **SUSAN A. COLE**,  
President of Montclair State University, in her  
official and individual capacities; **KAREN  
PENNINGTON**, Vice President of Student  
Development & Campus Life of Montclair  
State University, in her official and individual

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capacities; **MARGAREE COLEMAN-CARTER**, Dean of Students of Montclair State University, in her official and individual capacities; **PAUL M. CELL**, Chief of Police of Montclair State University, in his official and individual capacities; **KALUBA CHIPEPO**, Sergeant of Campus Police for Montclair State University, in his official and individual capacities; **YOLANDA ALVAREZ**, Chair of Bias Education Response Taskforce of Montclair State University, in her official and individual capacities; **HAMAL STRAYHORN**, Co-Chair of Bias Education Response Taskforce of Montclair State University, in her official and individual capacities; **THE STUDENT GOVERNMENT ASSOCIATION OF MONTCLAIR STATE UNIVERSITY INC.**,

Defendants.

#### **JOINT STIPULATION OF DISMISSAL**

NOW COME the Plaintiffs and Defendants and jointly stipulate to the dismissal of this action. In support thereof, the parties state as follows:

1. The parties have reached a resolution in this case that resolves all claims.
2. The parties stipulate that Counts I, III, IV, and VI of this lawsuit should be dismissed with prejudice and that Counts II and V should be dismissed without prejudice.
3. The parties stipulate that each party will bear its own costs.
4. This is not a class action lawsuit, no receiver has been appointed, and no federal statute that requires a court order for dismissing a case governs this lawsuit.
5. Plaintiffs have not previously dismissed any federal or state-court suit based on or including the same claims as those presented in this case.

Respectfully submitted this day, August 9, 2021.

*s/ Michael Laffey*

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*s/ Maria Vallejo*

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